

ATTACHMENT A

STIPULATION OF FACTS

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

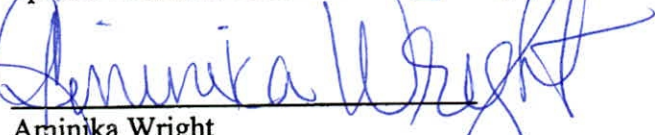
At all times relevant, **AMINIK WRIGHT ("WRIGHT")** was a resident of Maryland. From at least November 2017 through May 2018, **WRIGHT** devised and willfully participated in a scheme and artifice to defraud certain victims. Individual A introduced **WRIGHT** to various persons (collectively, "the victims") seeking assistance with certain services relating to the criminal justice and immigration systems. It was part of the scheme to defraud that **WRIGHT** falsely represented to the victims that she had the means and ability to assist, in exchange for payment for costs, in obtaining expedited immigration services and placement in residential drug treatment facilities, among other things.


In exchange for such services, **WRIGHT** solicited and obtained payment from the victims. Among other things, **WRIGHT** instructed the victims to transfer money for payment directly to Individual A, who then would provide the payments to **WRIGHT** in cash or otherwise. On or about January 23, 2018, **WRIGHT** caused Victim A, a resident of New York, to make an interstate wire transfer in the amount of approximately \$9,500 from a financial institution in New York to Individual A's bank account, located in the District of Maryland. **WRIGHT** obtained at least \$42,320 from the victims as part of the scheme and artifice to defraud.

SO STIPULATED:


Thomas P. Windom
Assistant United States Attorney

Lauren M. Elfner
Special Assistant United States Attorney


Aminika Wright
Defendant


Julie Stelzig
Counsel for Defendant